

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE

VERA D. MCFARLAND

Debtor

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CHAPTER 13

CASE NO: 14-12014AMC

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

The Debtor, through counsel, responds to the motion of William C. Miller, Esquire, Chapter 13 Standing Trustee (the "Trustee"), to dismiss (the "Motion") as follows:

1. The Motion asserts that Debtor is not making payments.
2. Debtor concedes that she has not made a payment to the Trustee since August 2018, when she stopped working.
3. Debtor has suffered a number of medical emergencies, including congestive heart failure and strokes, that caused her to be unable to continue employment.
4. Debtor has been maintaining her postpetition mortgage payments.
5. Debtor has substantially completed her plan and there is only a balance of \$2,370.89 to be paid on the "base amount" of her plan due on or before the 59-month plan termination date of February 18, 2019.
6. Debtor has applied for and is receiving Social Security Benefits of \$996 per month.
7. Debtor will be receiving disability/retirement benefits from her employer, the Transportation Security Administration that will allow her to pay the remaining balance of her plan.
8. There is no cause for dismissal of this case, which is almost completed.

WHEREFORE, Debtor prays that this Court enter an Order DENYING the Motion.

/s/ Alfonso G. Madrid
ALFONSO MADRID, ESQ.
Attorney for Debtor
757 South 8th St.
Philadelphia PA 19147
(215) 925-1002
(215) 689-4809 (fax)